

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

United States of America

v.

LANCE EALY

Defendant(s)

Case No.

3:13mj 471

MICHAEL J. NEWMAN

MICHAEL J. NEWMAN
UNITED STATES
MAGISTRATE JUDGE

13 OCT 28 PM 4:41

FILED

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 11/01/12 to Present in the county of Montgomery in the
Southern District of Ohio, the defendant(s) violated:

Code Section
18 U.S.C. §1029(a)(3)

Offense Description
Fraud and related activity in connection with access devices

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

MB Turk

Complainant's signature

SA Mary Beth Turk, USSS

Printed name and title

Sworn to before me and signed in my presence.

Date:

10/28/13

City and state:

DAYTON, OHIO



Michael J. Newman
Judge's signature

Magistrate Judge Michael J. Newman
Printed name and title

AFFIDAVIT:

I, Mary, Turk, being duly sworn, depose and state that I am a Special Agent (SA) with the United States Secret Service (USSS) and have been so employed since April 2007.

1. I have received training from the USSS on conducting criminal investigations. I am currently assigned to the USSS, Dayton Resident Office, and have assigned to participate in investigations involving financial crimes, specifically violations of Title 18, United States Code Section 1029, Fraud and Related Activity in connection with Access Devices.
2. This affidavit is made in support of a federal complaint and arrest warrant against **LANCE EALY** for violation of United States Code, Section 1029(a)(3), Fraud and Related Activity in connection with Access Devices; knowingly and with intent to defraud possesses fifteen or more devices which are counterfeit or unauthorized access devices. The following information is known to me or was reported to me by law enforcement officers involved in this investigation and/or other cooperating individuals with knowledge or relevant facts. This affidavit does not contain all the information derived from the investigation and/or interviews, but rather includes only those facts that I believe would be sufficient to establish probable cause to obtain a criminal complaint and arrest warrant in this matter. Unless specifically indicated, all conversations, statements and other information described in this affidavit are described only in part and in substance.

INTRODUCTION/TERMINOLOGY:

3. Personal Identifiable Information ("PII") can include examples such as individuals' names, addresses, social security numbers, dates of birth, places of work, duration of work, state driver's license numbers, mothers' maiden names, bank account numbers, bank routing numbers, e-mail account names, and other account passwords.
4. The term "Carding" refers to an assortment of illegal activities revolving around the theft and fraudulent use of

PII and payment card data, and "carders" refers to individuals who are engaged in illegal carding activity.

5. The term "Fulls" or "Fullz" ("Full Info(s)") is characterized as a slang term that carders use to describe a package of PII. The terms "info" or "infos" are also sometimes used by carders to refer to "fullz." "Fullz" typically include the following types of PII: names, addresses, social security numbers, dates of birth, places of work, duration of work, state driver's license numbers, mothers' maiden names, bank account numbers, bank routing numbers, e-mail account names, and other account passwords.
6. "Fullz" are frequently used by carders to take over the identity of a person in order to engage in various types of fraudulent activities, without the identity theft victim's consent. These can include opening new financial accounts, including credit card accounts, in the victim's name and making fraudulent purchases on, or transfers of funds from, those accounts, and taking out loans in the victim's name.
7. "Fullz" can be obtained by carders in a variety of ways, including but not limited to purchasing them from a vendor via e-mail or via a website maintained and/or operated by a vendor for the purpose of selling PII.

FACTS:

8. From approximately 2009 to 2012, a specific e-mail address known as wangsangpi@gmail.com was utilized by a particular vendor of PII ("Vendor"). It was discovered that a VENDOR utilized this email account to communicate with prospective and actual buyers of PII and "fullz" and to transfer stolen PII and "fullz" to customers. The PII and "fullz" that VENDOR offered for sale, sold, and/or transferred to others were stolen or otherwise illegally obtained, and VENDOR was not authorized to possess, transfer, and/or sell the PII or "fullz."
9. Beginning on or about March 2013, a Federal search warrant was executed for email addresses wangsangpi@gmail.com. The search warrant revealed that email address wangsangpi@gmail.com communicated with various email addresses, to include lanceealy123@yahoo.com, regarding the

purchase and/or transfer of stolen PII and "fullz" information.

10. The search warrant on email address wangsangpi@gmail.com revealed between the dates of January 12, 2012, and January 26, 2013, lanceealy123@yahoo.com purchased approximately three hundred and sixty three (363) "PII" and "fullz" from wangsangpi@gmail.com.
11. Beginning on or about February 10, 2013, email address wangsangepi@gmail.com was controlled by an undercover agent ("UC agent") located in New Hampshire, who utilized this email account to correspond with others, including **EALY**, while posing as VENDOR.
12. Beginning at a date around the time frame of January 2013 and continuing to a date uncertain, but at least as late as July 2013, in the Southern District of Ohio and elsewhere, **LANCE EALY**, devised and intended to devise a scheme and artifice to defraud others, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises.
13. It was part of the scheme that **EALY**, residing in Dayton, Ohio, utilizing e-mail addresses lanceealy123@yahoo.com and lanceealy@yahoo.com contacted and corresponded with individuals, including the UC agent.
14. It was further part of the scheme that **EALY** sought to purchase "fullz" from the aforementioned UC agent.
 - On February 18, 2013, lanceealy123@yahoo.com wrote: "I need fullz info filter with job disability"
 - On February 19, 2013, lanceealy123@yahoo.com wrote: "Hello are u there I need fullz info filter asap"
 - On February 22, 2013, lanceealy123@yahoo.com wrote: "Hello I have asking for fullz filter for 3 days I really need these asap I have LR right now"
 - On February 23, 2013, lanceealy123@yahoo.com wrote: "Can I buy the fullz or not"
 - On February 23, 2013, lanceealy123@yahoo.com wrote: "Hello do u have fullz"

- On February 23, 2013, lanceealy123@yahoo.com wrote: "Please I need these fullz asap I'm very loyal and I will continue to much Bussiness with u"
- On February 24, 2013, lanceealy123@yahoo.com wrote: "I have asked for fullz for the past week I have Lr right now"
- On February 24, 2013, lanceealy123@yahoo.com wrote: " OK how much do u want per fullz time is running out I need the fullz asap"
- On February 24, 2013, lanceealy123@yahoo.com wrote: "Can I buy fullz I need them ASAP"
- On February 24, 2013, lanceealy123@yahoo.com wrote: "Watt do I have to do to get fullz info I will do anything u ask me please I need the fullz info asap"
- On February 24, 2013 lanceealy123@yahoo.com wrote:"ok and how many fullz do have dob 1994"
- On February 25, 2013, lanceealy123@yahoo.com wrote:" Hello dou have fullz"
- On February 25, 2013, lanceealy123@yahoo.com wrote: "I need 20 fullz info filter THEY HAVE TO BE ON DISABILITY"
- On February 26, 2013, lanceealy123@yahoo.com wrote: "Wen r u go send me the fullz I have u 15 fresh amex cards
- On February 26, 2013 lanceealy123@yahoo.com wrote: " can u send fullz please"
- On May 14, 2013, lanceealy123@yahoo.com wrote: "hey bro any luck with the Fullz Info"
- On May 19, 2013, lanceealy123@yahoo.com wrote: "hey bro any luck with the fullz"
- On May 26, 2013, lanceealy123@yahoo.com wrote:" Hey bro u have any luck wit the fullz info"
- On June 10, 2013, lanceealy123@yahoo.com wrote: "Yes im interested do u have fullz info social security and wat payment methods are you accepting"
- On June 10, 2013, lanceealy123@yahoo.com wrote: "Ok I need 100 fullz info filter social security and how much is the price per 1"
- On June 10, 2013, lanceealy123@yahoo.com wrote: "Hey bro was u go mail the encrypted fullz to my address first or did u want me to send the money thru western Union first "
- On July 27, 2013, lanceealy@yahoo.com wrote: "Hey bro can I still buy fullz info from you let me know ASAP "

15. It was further part of the scheme that **EALY** was discussing to utilize such "fullz" in order to commit fraud and to obtain money and property by materially false and fraudulent pretenses, representations, and promises, by filing taxes without the consent of the individual (s) to obtain funds from the Government.

- On February 22, 2013, UC responds to lanceealy123@yahoo.com "Why? I want % if u do tax refund"
- On February 22, 2013 lanceealy123@yahoo.com wrote: " IMA expert at tax refunds and we can do much Bussiness together butt u have to get me the right fullz and if do we can make millions but we have to get things done this year because next year it will be harder to do tax refunds and once again I'm a expert at doing tax refunds I have been doing for 10 years so lets get things started"
- On July 27, 2013, lanceealy@yahoo.com wrote: "No bro I neva got wat u sent I need the ones for tax refund"

16. It was further part of the scheme that **EALY** provided information, including EALY'S personal information and "fullz" that EALY had previously obtained, to the UC agent in order to prove that EALY was not a member of law enforcement and to prove that EALY had previously purchased "fullz" from VENDOR.

- On November 29, 2012, lanceealy123@yahoo.com wrote: "OHIO WHERE U" to email address vditroiall@gmail.com
- On July 27, 2013, lanceealy@yahoo.com wrote: "Yes use lance ealy"
- On July 27, 2013, lanceealy@yahoo.com wrote: "The rangeley address is not working. I always be on 1486 guenther but u can use this address 4687 marlin ave Dayton ohio 45416"

17. It was further part of the scheme that on February 25, 2013, **EALY** provided the UC agent with seventeen (17) American Express payment card numbers (access devices) in exchange for "fullz."

- On February 24, 2013, lanceealy123@yahoo.com wrote: "Can I buy fullz I need them ASAP"
- On February 24, 2013, lanceealy123@yahoo.com writes "Watt do I have to do to get fullz info I will do anything u ask me please I need the fullz info asap"
- On February 24, 2013, the UC replies to lanceealy123@yahoo.com, " U have credit card #'s in xchange 4 fullz?"
- On February 24, 2013, lanceealy123@yahoo.com wrote" "I have plenty cards"
- On February 24, 2013, UC replies to lanceealy124@yahoo.com ,"Send my email 3 card #'s for 1 fullz...or 2 Amex for 1 fullz"
- On February 25, 2013, lanceealy123@yahoo.com sends via email seventeen (17) American Express payment card numbers.

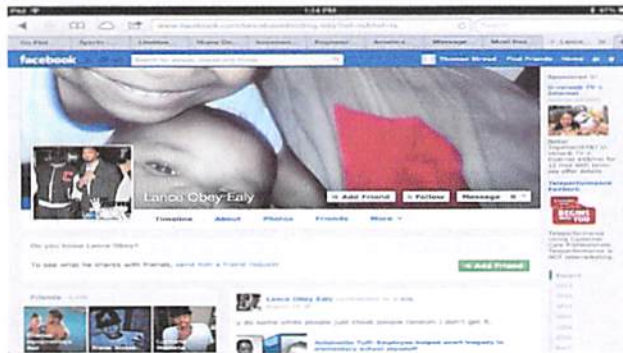
18. Pay Pal records indicate that on February 28, 2008, an account was created utilizing the following email addresses gbmgrodnigga@yahoo.com and lanceealy123@yahoo.com. Records further indicate that the account was created under the name Lance Ealy, date of birth December 6, 1985, social security number 290-84-8558, 1486 Guenther Road, Dayton, Ohio, 45417, 4595 Refuge Road, Columbus, Ohio, 43232, and 4687 Marlin Avenue, Dayton, Ohio, 45416.

19. This affiant conducted various database inquiries and discovered that EALY resides at 1486 Guenther Road, Dayton, Ohio, 45417, and/or 4687 Marlin Avenue, Dayton, Ohio, 45416. The various database inquiries further revealed that EALY'S true date of birth is December 6, 1985, and his true social security number is 290-84-8558.

20. Beginning in or about April 2013, the UC agent, utilizing email address wangsangpi@gmail.com, sent the below website link in an email to lanceealy123@yahoo.com to determine if LANCE EALY was associated with lanceealy123@yahoo.com

- u this

<https://www.facebook.com/lancebasedsodmg.ealy?ref=ts&fref=ts> ?



-On April 2, 2013 lanceealy123@yahoo.com wrote: Yea

21. In or about March 2013 a Federal search warrant was conducted on email address lanceealy123@yahoo.com which revealed a City of Dayton, Dayton, Ohio, Water Utility Bill, with the following account number; 810910012.

22. Records from the City of Dayton Utility Bill indicate that as of March, 2013, account number 810910012 belongs to a customer with a service address of 1622 Rangeley Ave, Dayton, Ohio. The records further indicate that the account number is under the name Lance Q. Ealy and the billing statement is mailed to Lance Q. Ealy at 1486 Guenther Road, Dayton, Ohio, 45417.
23. The previously mentioned search warrant conducted on email address lanceealy123@yahoo.com revealed emails that contained the telephone numbers of 937-674-4832 and 937-380-5711.
24. This affiant conducted a reverse phone look up on telephone numbers 937-674-4832 and 937-380-5711 which revealed the numbers belonged to Cincinnati Bell Telephone, Cincinnati, Ohio.
25. On or about June 3, 2013, an investigator with Cincinnati Bell Telephone advised this affiant that telephone numbers 937-674-4832 and 937-380-5711 belonged to customers of Cincinnati Bell Telephone but the accounts were closed due to fraud on December of 2012 and/or February of 2013.
26. Based on the above information, your affiant believes that probable cause exists that on or about February 25 2013, in the Southern District of Ohio, **EALY**, knowingly and with the intent to defraud possessed fifteen or more unauthorized access devices; namely 17 "Fullz," which were unauthorized access devices, in violation of Title 18, United States Code, Section 1029(a)(3).

Further your affiant sayeth naught.



Mary E. Turk

Special Agent, U.S. Secret Service

Subscribed and sworn before me this 28th day of October, 2013



Michael J. Newman
United States Magistrate Judge

